

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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EYEKING, LLC,

Case No. 2:17-cv-06215 (ADS)(SIL)

Plaintiff,

-against-

**DECLARATION IN SUPPORT
OF MOTION TO DISMISS**

JSS, LLC d/b/a I-SEA PRODUCTS,

Defendant.
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JOSEPH SANTLEY, pursuant to 28 U.S.C. § 1746, declares and affirms as follows:

1. I submit this declaration in support of the motion by Defendant JSS LLC (“JSS”) for an order of this Court pursuant to Fed.R.Civ.P. 12(b)(2) dismissing the claims against it for lack of personal jurisdiction. I have personal knowledge of the facts set forth herein.

2. I caused JSS to be formed in California on January 6, 2016. I am and have always been its sole member.

3. JSS maintains its sole and principal office in San Clemente, California from which it conducts its business.

4. JSS does not own, use or possess any real property in New York, nor does it conduct any business there, including by maintaining a telephone listing, bank account or brokerage account.

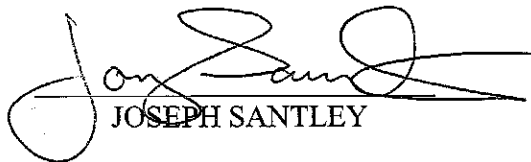
5. JSS does not travel to New York to solicit or conduct business or provide goods or services there, its does not advertise or have employees in the State of New York and it has had no contact from or a relationship with plaintiff Eyeking before Eyeking filed its claims against JSS in the New York State Supreme Court.

6. For the reasons set forth above and in the other submissions made on this motion,

I ask this Court to dismiss this action against JSS for lack of personal jurisdiction.

7. I declare under penalty of perjury that the foregoing is true and correct.

Dated: San Clemente, California
November 15, 2017



JOSEPH SANTLEY